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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

**CORRECTED REQUEST FOR ENTRY OF
ORDER BY DEFAULT ON DEBTOR'S
MOTION PURSUANT TO FED. R.
BANKR. P. 4001(d) TO APPROVE
STIPULATION BETWEEN PACIFIC GAS
AND ELECTRIC COMPANY AND GARY
GEORGE BEYROUTI AND DARYL J.
SPREITER FOR LIMITED RELIEF
FROM THE AUTOMATIC STAY**

[Re: Dkt No. 5327]

Objection Deadline: January 31, 2020
4:00 p.m. (Pacific Time)

**No hearing requested absent timely
objection. If timely objection is filed,
hearing reserved for:**

Date: February 26, 2020
Time: 10:00 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and debtors in possession (collectively, “**PG&E**” or the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”), hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures* entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter an order by default on the *Debtor’s Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation Between Pacific Gas and Electric Company and Gary George Beyrouiti and Daryl J. Spreiter for Limited Relief from the Automatic Stay* [Dkt. No. 5327] (the “**Motion**”).

RELIEF REQUESTED IN THE MOTION

The Motion seeks an order approving an agreement between the Utility, Gary George Beyrouiti, Trustee of Gary George Beyrouiti Revocable Trust, Dated December 10, 2003, and Daryl J. Spreiter, Trustee of the Daryl J. Spreiter Revocable Trust Dated February 6, 2006, as embodied in the *Stipulation Between Debtor Pacific Gas and Electric Company and Gary George Beyrouiti and Daryl J. Spreiter for Limited Relief from the Automatic Stay* (the “**Stipulation**”), which was attached to the Motion as **Exhibit A**. A proposed order (the “**Proposed Order**”) was attached as **Exhibit B** to the Motion.

NOTICE AND SERVICE

A *Notice of Opportunity for Hearing on Debtor’s Motion Pursuant to Fed. R. Bankr. P. 4001(d) to Approve Stipulation Between Pacific Gas and Electric Company and Gary George Beyrouiti and Daryl J. Spreiter for Limited Relief from the Automatic Stay* was filed concurrently with the Motion on January 10, 2020 [Dkt. No. 5329] (the “**Notice of Opportunity for Hearing**”). The Motion, the supporting declaration of Cesar V. Alegria, Jr. [Dkt. No. 5328], and the Notice of Opportunity for Hearing were served as described in the Certificate of Service of Andrew G. Vignali, filed on January 15, 2020 [Dkt. No. 5385].

The deadline to file responses or oppositions to the Motion has passed, and no oppositions have been filed with the Court or received by counsel for the Debtors.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that:

1. I am an attorney with the firm of Keller & Benvenuti LLP, co-counsel for the Debtors.
2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response or opposition has been filed with respect to the Motion.
3. This declaration was executed in San Francisco, California.

WHEREFORE, the Debtors hereby request entry of the Proposed Order substantially in the form attached to the Motion, granting the Motion as set forth therein.

Dated: February 3, 2020

WEIL, GOTSHAL & MANGES LLP
KELLER & BENVENUTTI LLP

/s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Debtors in Possession